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Pennsylvania Department of Environmental Protection

230 Chestnut Street
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June 6, 1996

Northwest Regional Office

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Mr. Frank Vavra
Remedial Project Manager (3HW22)
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

RE: Focused Feasibility Study
Operable Unit 2
Osborne Landfill Site
Pine Township, Mercer County

Dear Mr. Vavra:

Staff from the Pennsylvania Department of Environmental Protection's Hazardous Sites Cleanup Program ("Department") have reviewed the Operable Unit 2 Focused Feasibility Study dated May 2, 1996 for the Osborne Landfill Site. The Department has the following comments:

Risk Assessment; Page 2:
The fifth sentence states: "Future groundwater uses potentially pose a cancer risk of 7.2 E-4 for one residential well." The following sentence then identifies the future cancer risk as low because most residents are using the public water supply, however, it does not clearly identify the residence with the contaminated well which has a cancer risk of 7.2 E-4 as being connected to the public water supply. Please state that the residence with the contaminated well is connected to the public water system.

Alternative CM2 – No Action with Monitoring; Section 4.2.2.1:
The first paragraph states that the groundwater quality will be monitored using standard methods that are routine and widely accepted. Please identify the methods that will be used.

The second sentence in the second paragraph states that six wells in the Clarion Aquifer and nine wells in the mine void system, plus one additional well are to be monitored annually. The Department's Hazardous Waste Regulations, 25 PA Code §265.92(e)1, require samples to be obtained and analyzed at least semi-annually. Therefore, unless demonstrated otherwise, the Department will require Cooper Cameron Corporation to perform semi-annual analysis on all sixteen wells that comprise the groundwater monitoring well network.

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Long-Term Effectiveness; Section 4.2.3.4:
The fourth sentence states that there are concerns that the chlorinated compounds (COC's) at the site have not been shown to reliably degrade by biological activity and may result in a less than effective (questionable) alternative due to distribution within the voids and fractures. If the long-term effectiveness of this alternative is questionable, then how can this alternative be protective for the long-term as stated in Section 4.2.3.2? Please explain.

Thank you for the opportunity to comment on the Operable Unit 2 Focused Feasibility Study Report. If you have any questions regarding the above comments, please feel free to contact me at the number above.

Sincerely,

Robert J. Kimball

Robert J. Kimball
Project Manager
Hazardous Sites Cleanup

cc: R. Kimball (file)
C. Dougherty
T. Ung (Central Office)